

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

SL LIQUIDATION, *et al.*,¹

Debtors.

Chapter 11

Case No. 23-10207 (TMH)
(Jointly Administered)

Obj. Deadline: December 27, 2023 at 4:00 p.m. (ET)
Hearing Date: January 3, 2024 at 11:00 a.m. (ET)

**NOTICE OF FIRST OMNIBUS CLAIM OBJECTION (NON-SUBSTANTIVE)
OF THE COMMITTEE TO CERTAIN CONVENIENCE CLASS CLAIMS
THAT ARE (I) DUPLICATIVE CLAIMS, (II) LATE FILED CLAIMS
AND (III) NO LIABILITY CLAIMS**

PLEASE TAKE NOTICE that, November 29, 2023, the Committee² in the above-captioned case filed the attached *First Omnibus Claim Objection (Non-Substantive) of the Committee to Certain Convenience Class Claims That Are (I) Duplicative Claims, (II) Late Filed Claims and (III) No Liability Claims* (the “First Omnibus Objection”)³ with the United States Bankruptcy Court for the District of Delaware (the “Court”).

PLEASE TAKE FURTHER NOTICE that each claimant that has filed a claim that is affected by the First Omnibus Objection is receiving a copy of the First Omnibus Objection. Affected claimants should read the First Omnibus Objection and Schedule 1, 2 and 3 to the proposed order attached thereto, which detail the claims subject to the First Omnibus Objection and the grounds for such objections.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are as follows: SL Liquidation LLC (0378); TPP Liquidation, Inc. (5202); HTPPS Liquidation, Inc. (2594); and HGTPPS Liquidation, Inc. (1734). The Debtors’ service address for purposes of these chapter 11 cases is PMB #179, 1159 Second Avenue, New York, NY 10065.

² Capitalized terms used herein which are not otherwise defined will have the same meanings as in the *Combined Disclosure Statement and Chapter 11 Plan of Liquidation dated September 25, 2023* [Docket No. 604] (the “Plan”).

³ Capitalized terms used but not defined herein shall have the meanings ascribed to such terms in the First Omnibus Objection.

RESPONSES TO CLAIM OBJECTIONS

PLEASE TAKE FURTHER NOTICE that any party wishing to oppose the relief requested in the First Omnibus Objection must file a response (a “Response”) to the First Omnibus Objection with the Clerk of the Bankruptcy Court for the District of Delaware, 824 Market Street, 3rd Floor, Wilmington, Delaware 19801, and serve a copy of the response on the Committee, Morris James LLP, 500 Delaware Avenue, Suite 1500, Wilmington, Delaware 19801, Attention: Brya M. Keilson, Esq. (bkeilson@morrisjames.com), and Jeffrey R. Waxman, Esq. (jwaxman@morrisjames.com) so as to be received on or before **December 27, 2023 at 4:00 P.M. (ET)**. **Only those Responses timely filed with the Court and received by the Notice Parties identified above will be considered by the Court.**

PLEASE TAKE FURTHER NOTICE that any response to the First Omnibus Objection that is filed with the Court must:

- a. In writing;
- b. a caption setting forth the name of the Court, the name of the Debtor, the case number, and the title of the Objection to which the Response is directed;
- c. the name of the claimant, the claim number, and a description of the basis for the amount of the Claim;
- d. the specific factual basis and supporting legal argument upon which the party will rely in opposing this Objection;
- e. all documentation and other evidence in support of the Claim, not previously filed with the Court or the claims agent, upon which the claimant will rely in opposing this First Omnibus Objection; and
- f. the name, address, telephone number, fax number and/or email address of the person(s) (which may be the claimant or the claimant’s legal representative) with whom counsel for the Committee should communicate with respect to the claim subject to the First Omnibus Objection and who possesses authority to reconcile, settle, or otherwise resolve the objection to the Claim on behalf of the claimant

PLEASE TAKE FURTHER NOTICE that, if you fail to respond in accordance with this Notice, the Court may grant the relief requested by the First Omnibus Objection without further notice or hearing.

PLEASE TAKE FURTHER NOTICE that, if a Response is filed, a hearing on the First Omnibus Objection will be held on **January 3, 2024 at 11:00 a.m. (prevailing ET)** (the “Hearing”) before The Honorable Thomas M. Horan, United States Bankruptcy Judge, at the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 3rd Floor, Courtroom 7, Wilmington, Delaware 19801.

PLEASE TAKE FURTHER NOTICE that if you file a response to the First Omnibus Objection, you should be prepared to argue that response at the Hearing. You need not appear at the Hearing if you do not object to the relief requested.

PLEASE TAKE FURTHER NOTICE that the Hearing may be continued from time to time upon written notice to you or as declared orally at the Hearing.

Dated: November 29, 2023

MORRIS JAMES LLP

/s/ Brya M. Keilson

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